



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

January 30, 2001

Van Tran Electric Corporation
7711 Imperial Drive
P.O. Box 20128
Waco, Texas 76702-0128

Van Tran Electric Corporation
1505 Van Tran Avenue
Vandalia, Illinois 62471

Re: 0510350004 – Fayette County
Van Tran Electric Corporation
ILD981093628
RCRA Closure File

Gentlemen:

In September 1997, the USEPA published its national Strategic Plan, setting forth clear environmental goals through the year 2005. As required under the Government Performance and Results Act ("GPRA"), the Strategic Plan describes the USEPA's mission and ten broad goals that will serve as the framework for the USEPA's planning and resource allocation decisions. The USEPA based its goals on public priorities as articulated by Congress in the form of statutory mandates and as expressed in direct public comment.

Goal Number 5 in the USEPA's Strategic Plan is as follows:

"Better waste management, restoration of contaminated waste sites, and emergency response."

The USEPA's stated objectives under Goal 5 include reducing or controlling risks to human health and the environment at over 375,000 contaminated Superfund, RCRA, UST, and brownfield sites, and managing the roughly 14,000 facilities defined by RCRA Subtitles C, and D *according to practices that prevent dangerous releases to the environment*. More specifically related to RCRA hazardous waste facilities, the EPA has committed to preventing dangerous releases to air, soil, and groundwater at 80% of such facilities in the United States by the year 2005. Because this commitment is made as part of its GPRA strategy, the USEPA regards this as one of its highest priorities.

Recently, USEPA Region 5 established an inventory or "universe" of RCRA facilities which fall under this 80% commitment. The status of RCRA facilities as of October 1, 1997, was selected to establish an overall baseline universe (i.e., the list of 100% of affected facilities). The current

GEORGE H. RYAN, GOVERNOR

status of these same RCRA facilities has been used to determine the percentage of facilities that are at this time "under control" (i.e., facilities where all hazardous waste units are being managed according to practices that prevent dangerous releases).

To gain a better understanding of exactly what efforts will be necessary to meet the commitment to have 80% of RCRA facilities under control by the year 2005, the USEPA has further broken down the universe of facilities into separate subset universes listing (1) RCRA facilities with operating hazardous waste units not involving land disposal, and (2) RCRA facilities which have closed or will likely close with hazardous waste in place and hence need post-closure care. Some facilities are listed only in the operating universe ("OPU"), some are listed only in the post-closure universe ("PCU"), and some facilities are listed in both. Comparing these two lists quickly demonstrated that the majority of facilities in Region 5 with operating RCRA units already have permits and are therefore "under control," but also that much work remains before the post-closure universe can achieve the 80% number.

The USEPA has decided that it will not be necessary in all cases for a facility with one or more land disposal units to have a full post-closure permit in place (under 40 CFR 264 or the equivalent state regulations) in order for that facility to be considered as "under control." There will be some flexibility for facilities which have an enforceable agreement in place with its state environmental USEPA to be considered "under control" for the purposes of the 80% commitment. However, any such agreement would also need to include a groundwater monitoring and post-closure care scheme deemed equivalent to that in a RCRA post-closure permit (i.e., 40 CFR Part 264 Subparts F and G or the state equivalent). Under appropriate circumstances, formally including the units under corrective action requirements in a RCRA permit or RCRA administrative order (40 CFR 264.101 or RCRA 3008(h), respectively) may be another option for bringing a facility with hazardous waste post closure units under control.

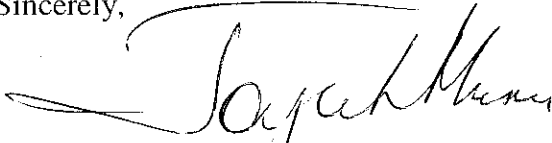
This letter is being sent to you because your facility is currently listed on USEPA's and Illinois EPA's GPRA post-closure universe and is shown as not yet under control. My purpose in sending this letter is to alert you to the importance that the USEPA and Illinois EPA now place on moving facilities such as yours into "under control" status, and to urge you to contact and work with the Illinois EPA to explore the various options for achieving this status. Many facilities which are currently under an enforceable interim status closure plan might be able to work with Illinois EPA to upgrade the groundwater monitoring and post-closure care language in those documents, expeditiously bringing the facility to "under control" status.

Thank you for your cooperation in this matter. With your help, the public can be assured that the country's wastes will be stored, treated, and disposed in ways that prevent harm to people and to the natural environment.

Page 3

If you have any questions about this letter, or would like to explore post closure options that may be open to you, please contact me at the above address or phone number.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce L. Munie". The signature is written in dark ink and is positioned above the printed name.

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:SCC\mls013481.doc

cc: Harriet Croke, USEPA

Jon A

MEMORANDUM

DATE: February 26, 1990
TO: Bruce Carlson, Enforcement Programs
FROM: Kenn Liss, *KL* Compliance Section
SUBJECT: 0510350004/Fayette County
Van Tran Electric Corporation
ILD981093628
Compliance

This memo is to update you on the status of Van Tran with respect to the outstanding closure plan violations for the RCRA surface impoundments.

Since the October 16, 1989 Pre-Enforcement Conference, Van Tran has progressed slowly towards securing a contractor to initiate the closure activities and Subpart F groundwater work. Steve Parke has been keeping in contact with our office by telephone and in writing. His latest written correspondence, dated February 7, 1990, is attached.

I spoke with Steve Park on February 26, 1990 and he indicated that Van Tran's attorney, Gerald Tockman, authored a February 23, 1990 letter to the Agency addressing the RCRA and Immediate Removal issues. I have not yet received a copy of that correspondence.

If you recall Van Tran was supplied with several lists of environmental contractors in our November 29, 1989 letter. I think the facility has been given a reasonable amount of time to secure a contractor. If Tockman's letter does not include firm commitment dates for implementing the closure plan and Subpart F activities, the RCRA violations should be referred to the USEPA on a priority basis.

Why not 1A6?

cc: Division File
Ken Page
Harry Chappel
Kenn Liss
USEPA Region V ✓

817
772-9740



VanTran ELECTRIC CORPORATION

7711 IMPERIAL DRIVE • P.O. BOX 20128 • WACO, TEXAS 76702-0128

copy: ~~Ken Liss~~
Field office (southern)
USEPA Reg. II
K. Liss (2 copies)

orig
to
file

February 7, 1990

0510350004 - Fayette Co.
VanTran Electric Corp.
ILO 981093628
Compliance

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

Dear Ms Tin,

I would like to update our status regarding your letter of November 29, 1989, and my letter of December 14, 1989.

1. Status of closure plan - we have narrowed our list of contractors to a list of two, I am still waiting on a quote from one of them. I should have something definite within a couple of weeks.
2. Start date of groundwater monitoring - no date as yet. There is a conflict of interest with one of the contractors and his sub-contractor for the water monitoring. We both picked the same laboratory for monitoring. I have two new labs quoting the ground water monitoring. I should have the results in a couple of weeks.
3. Repairing Wells - Per a phone call with Ken Liss, I was advised I could make the repairs myself. This will be done as soon as weather permits.
4. QA/QC Report was sent December 14, 1989.

As soon as I get answers to items (1) and (2) I will forward start up dates.

Very truly yours,

VANTRAN ELECTRIC CORPORATION

Steve Parke
Vice-President

SP/SW

CC: Jerry Tockman

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~~XC USEPA~~
~~xc FOS Collinsville~~
~~xc KWL~~
~~Then CEN~~

December 14, 1989

Illinois Environmental Protection Agency
Technical Compliance Unit
Division of Land Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276

Attn: Angela Aye Tin

Dear Ms. Tin:

In response to your November 29, 1989 letter, I will bring you up-to-date in regard to the four items in question.

1. We were unable to get Baker Engineering to proceed with the closure plan. I took the contractor list you mailed and sent inquiry letters to all contractors in the Vandalia area. Response has been few so far, and most of these cannot get to the site until after the first of the year. We will narrow the list to three contractors hopefully by January 15th.
2. In response to item two, we again, will need a contractor to implement a monitoring program.
3. PSI the sub contractor that installed the wells for Baker will not repair the wells. Could we do the repairs ourselves? I could have someone repair them immediately, weather permitting.
4. Enclosed is a copy of Bakers QA/QC report you never received.

Please respond to item three as soon as possible. If you will not allow us to repair the wells I must include this in the list I send to the contractor.

As soon as we can narrow our list and pick a contractor, hopefully by January 15th, I will forward and up date to items one, two and three.

Very truly yours,

VANTRAN ELECTRIC CORPORATION

Steve Parke
Vice-President

SP/cjw

Encl. (1)

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DEC 18 1989

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772-9740



VanTran ELECTRIC CORPORATION

7711 IMPERIAL DRIVE • P.O. BOX 20128 • WACO, TEXAS 76702-0128

11/15 Also Copy - Bruce Carlson Env.
Ken Page
Todd Howe
USEPA Reg IV
Collinsville + C. Nixson
K. Liss

orig to file

November 13, 1989

Illinois Environmental Protection Agency
2200 Chruchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Attn: Ken Liss

Dear Mr. Liss:

As of November 10, 1989 our attorney, Gerald Tockman, and myself have been unsuccessful at getting Baker Engineering involved in the RCRA closure. They will not respond to any of our letters and what little response we got over the phone was very vague.

I need a time extension in getting the closure underway.

I would also like your help in locating an approved contractor within close proximity to the Vandalia area. Please send a list of several names so we may get a cost and time table for the closure.

I am sorry for the delay, but we thought Baker would complete the closure per my phone conversations with Baker before our Collinsville meeting.

Please advise.

Very truly yours,

VANTRAN ELECTRIC CORPORATION

Steve Parke
Vice-President

SP/cjr

cc: Gerald Tockman

0510350004 - Fayette County
Vandalia / VanTran Electric Corp.
IL0981093628
Compliance File

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NOV 15 1989
IEPA-DLPC

(10)



Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

USEPA

Date: August 9, 1989
To: Division File
From: Kenneth W. Liss, Technical Compliance Unit
Subject: 0510350004--Fayette County
Vandalia/Van Tran Electric Corp.
ILD981093628
Compliance

On Thursday, August 3, 1989 an internal meeting was held to discuss the status of the above named site with respect to the ongoing remedial management and RCRA activities. Attending were Bruce Carlson, Enf.; Steve Anderson and Ken Page, RPMS; Todd Rowe, PS; and myself.

An Agency approved closure and post-closure plan was issued to the facility by letter dated July 18, 1988. The plan outlined two options for closing the on site disposal pit (regulated as a surface impoundment S04) and included the conditions for implementing a groundwater monitoring program in accordance with 35 Ill. Adm. Code, Subpart F. The last correspondence from Van Tran was dated October 19, 1988 which consisted of boring logs, construction diagrams and well development information for two newly installed wells (MW-E & MW-F). This information was provided in accordance with conditions 8.a. through 8.e. of the July 18, 1988 closure plan. The facility has not complied with the remaining conditions for groundwater monitoring nor have they implemented the closure plan.

Ken Page indicated that the Agency has retained a consultant, Camp Dresser & McKee (CDM), to draft a Work Plan for a remedial investigation at the site. It appears the draft plan will become final with the incorporation of the Agency's comments (see August 9, 1989 letter to CD&M). At this time the plan does not include the pit.

It was decided that a compliance letter will be sent to Van Tran to determine the company's position on the outstanding violations of the closure plan and groundwater requirements.

Pending receipt of Van Tran's response, Ken Page and Steve Anderson will incorporate the pit at the facility into the work plan. If Van Tran defaults on the closure plan, the pit will then be handled by RPMS in accordance with the RCRA plan.

cc: USEPA Region V
Southern Region
Bruce Carlson
Steve Anderson
Ken Page
Tod Rowe



217/782-6762

Refer to: LPC #0510350004 -- Fayette County
Van Tran Electric Corporation
ILD981093628
RCRA-Closure

Log No. C-431

July 18, 1988

Van Tran Electric Corporation
Attn: Steve Parke
7711 Imperial Drive
P.O. Box 20128
Waco, Texas 76702-0128

Dear Mr. Parke:

The conditions listed below outline the closure and post-closure requirements of 35 Ill. Adm. Code, Part 725 for the hazardous waste (S04) surface impoundment (pit) at your Vandalia, Illinois facility.

1. Van Tran may either follow the procedures listed in the conditions below or Van Tran shall first excavate soil from the impoundment by excavating a roughly circular area at grade elevation approximately 16 feet in diameter centered on the current surface impoundment. The excavation shall proceed to a depth of approximately eight feet maintaining a sideslope angle of about 60° from the horizontal. After the excavation has been completed Van Tran shall perform sampling as detailed in the conditions below.
2. Soil Sampling and Analysis
 - a. Soil borings are needed to determine the horizontal and vertical extent of soil contaminated above Agency established cleanup objectives listed in Condition 2.e. below.
 - b. Using the formula in the Agency's closure plan instructions, the sampling grid interval is calculated to be 3.0 feet. This grid should be constructed to overlap the outer edge of the pit to determine both vertical and horizontal contamination. Van Tran shall take two soil sampling points inside the eight foot diameter pit and use all the grid intersections outside the pit for sampling points. The grid shall be expanded outward until the Agency established cleanup objectives are met.
 - c. Soil sampling increments shall be six inches for the upper two feet of soil and twelve inches below a depth of two feet. Sampling must be done in at least the first eight feet of soil below grade elevation unless contaminated soil is excavated first to a depth of eight feet as stated in 1. above, and, if the 8' - 9' increment is



contaminated above Agency established cleanup objectives, the sampling procedure shall continue downward until the objectives have been reached. The amount of soil obtained from a sampling interval to form a sample shall be minimized to prevent dilution of contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed.

- d. Soil sampling shall be required after conditions 2.a, 2.b and 2.c have been performed and after excavation to demonstrate that all of the soil contaminated above Agency established cleanup objectives has been removed. This sampling shall be performed in the first foot of undisturbed soil below the excavation and along the side walls in six inch increments using, at a minimum, the sampling points used in b and c above.
- e. Each soil sample shall be analyzed for the parameters listed below. Also listed below are the Agency established cleanup objectives for the parameters of concern.

<u>Parameter</u>	<u>Cleanup Objective</u>
Lead ¹	0.1 mg/l
Cadmium ¹	0.05 mg/l
Zinc ¹	1.0 mg/l
Acetone	830.0 mg/kg
2-Butanone	169.0 mg/kg
Toluene	1.3 mg/kg
Xylenes	2.1 mg/kg
Ethylbenzene	3.2 mg/kg
Styrene	2.5 mg/kg
4-Methyl-2-Pentanone	50.9 mg/kg
Benzene	2.0 mg/kg
1,1,1,-Trichloroethane	4.0 mg/kg
Methylene Chloride	19.3 mg/kg
PCBs	10.0 mg/kg

¹Heavy Metal Analysis by E.P. Toxicity Procedure

- f. Soil sampling shall be done in accordance with the Agency's soil volatile sampling procedures (Attachment 2). These procedures shall be used since some of the parameters are volatile organics. In order to demonstrate a parameter is not present in the sample, the detection limit must be at least as low as the Practical Quantitation Limit (PQL) in the latest edition of SW-846.

3. Contaminated Soil Removal

Van Tran shall excavate all the contaminated soil in a manner to ensure:



Page 3

- a. all contaminated soil above Agency established cleanup objectives has been excavated;
- b. proper management of soil as a hazardous waste or a non-hazardous waste, and
- c. worker safety.

4. Contaminated Soil Management

- a. If the analysis, as required by Condition 2 above, of the soil indicates the presence of any of the following constituents (toluene, benzene, 1, 1, 1-trichloroethane or methylene chloride) the soil shall be managed as a F002 and/or F005 listed hazardous waste or if the analysis shows that the soil meets the definition of a characteristic hazardous waste (35 Ill. Adm. Code, Subtitle G, Part 721, Subpart C) the soil must be managed as a RCRA hazardous waste. Also, if the soil analyses show any PCBs above 50 ppm, the soil must be managed as a TSCA waste.
- b. If the soil analysis shows the soil is not a RCRA hazardous waste and not a TSCA waste, then the soil must be managed as an Illinois non-hazardous special waste.

5. Decontamination of Equipment

- a. All equipment shall be decontaminated by scraping, then steam cleaning with an industrial cleaner and triple rinsed.
- b. The rinsate shall be collected and analyzed for the parameters listed below:

Parameter

Toluene
Benzene
1, 1, 1-Trichloroethane
Methylene Chloride

- c. If the analysis of the rinsate detects any of the parameters listed above or the rinsate meets the definition of a characteristic hazardous waste (35 Ill. Adm. Code, Subtitle G, Part 721, Subpart C) then the rinsate must be managed as a RCRA hazardous waste.
- d. In any event, the rinsate must be managed as an Illinois special waste.



- e. Disposal of Illinois special waste, including hazardous waste, within the State of Illinois requires a Special Waste Stream Permit issued by the IEPA.

6. Restoration of Pit

After it has been demonstrated, using the sampling procedure described in Condition 2. above, that all soil contaminated above Agency established cleanup objectives has been excavated from the pit and surrounding area, the excavated area shall be backfilled to original grade elevation using clean fill material from off-site. The area shall then be vegetated.

7. Analytical Methods

Laboratory analytical methods shall follow guidance in USEPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," latest Edition. Specifically, at a minimum, USEPA's SW-846 analytical method 8080 should be used for PCBs and USEPA's SW-846 analytical method 8240 should be used for volatile organics.

8. Groundwater Monitoring

Four wells designated MW-A through MW-D were installed at the site during April of 1987 in accordance with the conditions set forth in the Consent Plan dated March 1, 1987. Well MW-D appears to satisfy the requirements for an upgradient well as defined in 35 IAC 725.191(a). Well MW-A and the installation of at least two additional wells should satisfy the minimum requirements of Section 725.191(a)(2). With respect to well construction and placement of the new wells, Van Tran shall do the following:

- a. At least one well shall be installed immediately downgradient of the regulated unit, but no greater than 30 feet from the limit of the waste management area. The well screen shall be no longer than 10 feet in length and placed to allow two feet of screen above the water table surface.
- b. At least one well shall be installed immediately downgradient of the regulated unit no less than 30 feet and no greater than 40 feet from the limit of the waste management area. The boring for this well, or wells, should extend to the top of the first clay unit beneath the saturated sand. The unit was described in earlier reports as a dark gray or blue, to light gray dense clay. The estimated depth to the clay unit is 35 to 40 feet below ground surface. The bottom of the screen in this zone shall begin at the top of the clay unit and extend upwards for 10 feet. If the clay unit is not encountered, the bottom of the screen shall be at an elevation that is no greater than 30 feet below the water table.



- c. All new monitoring wells shall be installed and constructed in accordance with the procedures and materials outlined on pages 3 and 4, Well Installation, of the January 1987 Envirodyne Engineers, Inc. submittal.
- d. Well development shall include the removal of a sufficient volume of groundwater from each well until the temperature, pH, and specific conductance readings have stabilized. Well development shall be conducted no sooner than 48 hours after well completion.
- e. The boring logs, well completion diagrams, and development information shall be submitted to the Agency within 60 days of final well construction. Van Tran shall submit the attached "Well Completion Report" form (Attachment 3) for each well.
- f. Within 15 days of well development as described in (d) above, monitoring wells MW-A, MW-D and all new wells installed in accordance with this closure plan must be sampled and analyzed for the parameters listed in Attachment 4, the Hazardous Substance List (HSL).
- g. Within 45 days of the initial sampling required in (f) above, the groundwater monitoring wells will be resampled for the parameters listed in Attachment 4, the Hazardous Substance List (HSL).
- h. The analytical results of all groundwater sampling events shall be submitted to the Agency within 15 days of the laboratory reporting date to the facility.
- i. Within 90 days of the initial sampling event required in (f) above Van Tran must submit a groundwater assessment report which at a minimum meets the requirements of 35 IAC Subpart F, Section 725.193(d)(4) and includes the appropriate determination required in 35 IAC Section 725.193(d)(6) or (d)(7),
- j. Depending on the determination of groundwater quality in (i) above, Van Tran must submit within 90 days of the initial sampling event a groundwater monitoring plan for continued detection or assessment monitoring of the regulated unit, to include at a minimum four quarterly sampling events.
- k. If Van Tran cannot demonstrate "clean" closure (35 Ill. Adm. Code 725.328(a)(1)) for the surface impoundment, Van Tran shall provide post-closure care in accordance with 35 Ill. Adm. Code 725.328(a)(2) and (b) until such time that a 35 Ill. Adm. Code Part 724 post-closure care permit is effective that addresses the surface impoundment.



9. Closure Certification Statement and Closure Documentation Report

Closure activities must be completed by October 31, 1989. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by December 31, 1989.

The attached closure certification form (Attachment 1) must be used. Signatures must meet the requirements of 35 Ill. Adm. Code, Section 701.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, sec.1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

Also along with closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. The waste manifest numbers.
- d. Copies of the waste manifests.
- e. A description of the sampling and analytical methods used.



Page 7

- f. A chronological summary of closure activities and the cost involved.
- g. Color photo documentation of closure. Document conditions before, during and after closure.
- h. Tests performed, methods and results. APPENDIX 2

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Also mail one copy of all certifications, logs or reports which are required to be submitted to the Agency by the facility to the following address:

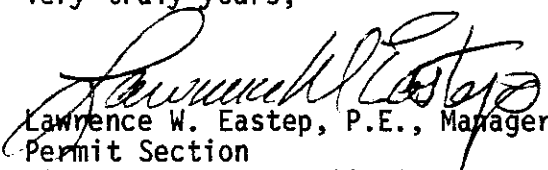
Illinois Attorney General's Office
Attn: James Morgan, Assistant Attorney General
Environmental Control Division
500 South 2nd Street
Springfield, Illinois 62706

- 10. Under the provisions of 29 CFR 1910 (51 FR 15, 654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
- 11. By April 31, 1989 Van Tran shall submit to the Agency a closure plan for the two hazardous waste (S01) container storage areas at the facility.



Should you have any questions regarding this matter, please contact
G. Tod Rowe at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:GTR/mls/sp1739j/1-8

Attachments

cc: Division File -- RCRA Closure
Collinsville Region
Kenn Liss, Compliance Section
G. Tod Rowe, Permits Section
Dennis Newman, Remedial Project Management Section
Nancy Mackiewicz, IAG's Office
Jim Morgan, IAG's Office
Bruce Carlson, Enforcement
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy



ATTACHMENT 1

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement
Log No. C-431

The hazardous waste management S04 Unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.
Illinois

Name of Registered P.E. and
Registration Number

Date

SOIL VOLATILE SAMPLING PROCEDURES

A. PREPARATION AND DECONTAMINATION OF STAINLESS STEEL SOIL SAMPLERS

- *1. Wash tubing or sampler with hot water and a nonfoaming detergent, such as trisodium phosphate.
2. Rinse with hot water.
- *3. Rinse with a pesticide grade solvent, such as hexane.
4. Rinse with very hot water to drive off solvent.
5. Rinse with deionized water.
6. Store the sampler in aluminum foil until ready for use.

*Consult the laboratory for specific recommendations.

B. SOIL SAMPLING FOR VOLATILE ORGANICS

1. Using a properly decontaminated and stored stainless steel sampler (refer to preparation and decontamination instructions), take a core sample of soil.
2. Add additional clay to the ends of the sample, if necessary, to eliminate headspace.
3. Cover both ends of the sampler with aluminum foil. Cover the aluminum foil with a plastic cap, such as a thread protector.
4. Put the sample on ice immediately.
5. Transport the samples to the laboratory as soon as possible. Most labs require delivery within 24 hours of sampling.

NOTE: Soil samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method.


Illinois Environmental Protection Agency
Well Completion Report

Site #: _____ County: _____ Well #: _____

Site Name: _____ Grid Coordinate: Northing: _____ Easting: _____

Drilling Contractor: _____ Date Drilled Start: _____

Driller: _____ Geologist: _____ Date Completed: _____

Drilling Method: _____ Drilling Fluids (type): _____

Annular Space Details

Type of Surface Seal: _____

Type of Annular Sealant: _____

Amount of cement: # of bags _____ lbs. per bag _____

Amount of bentonite: # of bags _____ lbs. per bag _____

Type of Bentonite Seal (Granular, Pellet): _____

Amount of bentonite: # of Bags _____ lbs. per bag _____

Type of Sand Pack: _____

Source of Sand: _____

Amount of Sand: # of bags _____ lbs. per bag _____

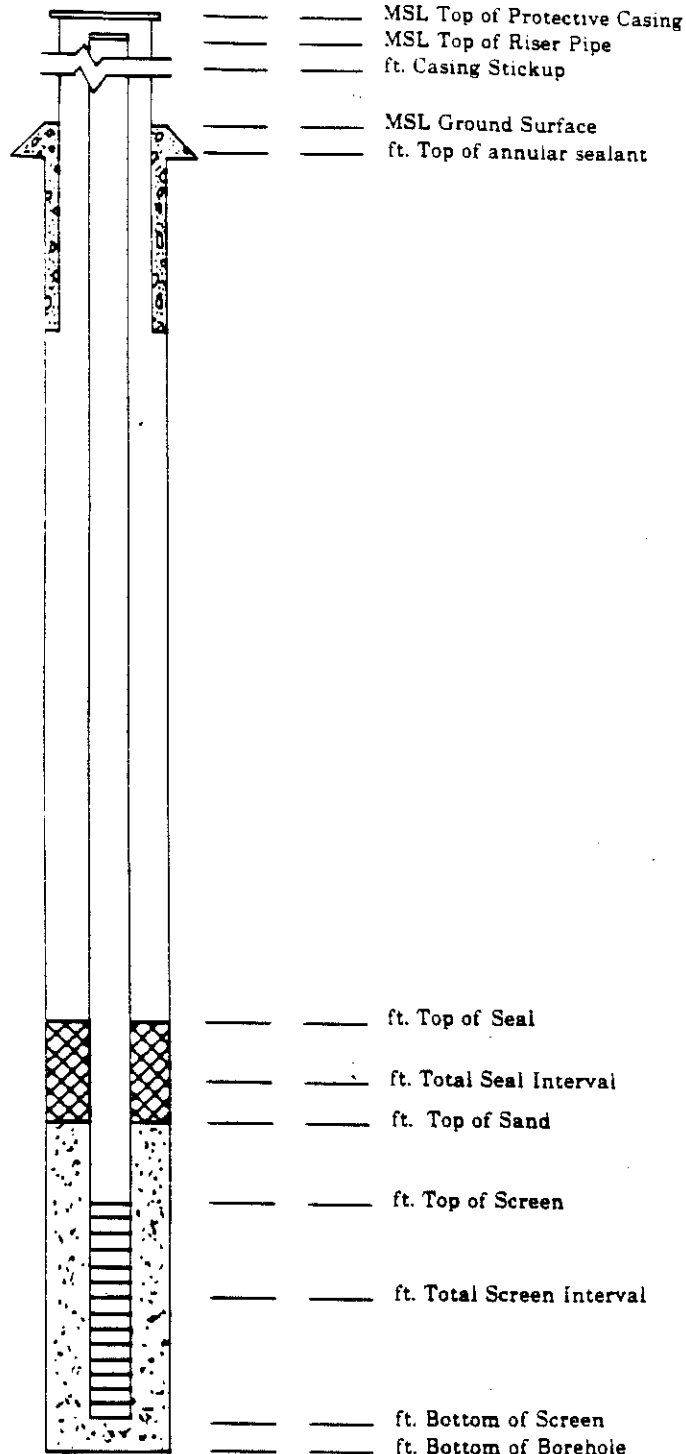
Well Construction Materials

	Stainless Steel Specify Type	Teflon Specify Type	PVC Specify Type	Other Specify Type
Riser coupling joint				
Riser pipe above w.t.				
Riser pipe below w.t.				
Screen				
Coupling joint screen to riser				
Protective casing				

Measurements

to .01 ft. (where applicable)

Riser pipe length	
Protective casing length	
Screen length	
Bottom of screen to end cap	
Top of screen to first joint	
Total length of casing	
Screen slot size	
of openings in screen	
Diameter of borehole (in)	
ID of riser pipe (in)	

Elevations - .01 ft.


Completed by: _____ Surveyed by: _____ Ill. registration # _____

Summer/Fall 198

analytical CONTROL

NUS Corporation
Laboratory Services Div
Park West Two
Pittsburgh, PA 15275
(412) 788-1080

A Publication of the Laboratory Services Division of NUS Corporation, a Halliburton Company.

(HSL) APPENDIX VIII, APPENDIX IX, SUPERFUND, AND PRIORITY POLLUTANT COMPOUNDS

Common Name	Appendix VIII (DQ)	HSL Superfund List	Priority Pollutants	Common Name	Appendix VIII (DQ)	Superfund List	Priority Pollutants
ORGANICS				chloroform	X		
acenaphthene	X	X	X	chloromethane	X	X	X
acenaphthylene	X	X	X	2-chloronaphthalene	X	X	X
acetone	X	X		2-chlorophenol	X	X	X
acetonitrile	X		X	4-chlorophenyl phenyl ether	A	X	X
acetophenone	X			3-chloropropene	X	X	X
2-acetylaminofluorene	X			3-chloropropionitrile	X		
acrolein	X		X	chrysene	X		
acrylonitrile	X		X	ortho-cresol	X	X	X
aldrin	X	X	X	para-cresol	X	X	X
allyl alcohol	X			4,4'DDD	X	X	
4-aminobiphenyl	X			4,4'DDE	X	X	X
aniline	X	(removed)		4,4'DDT	X	X	X
anthracene	X	X	X	dibenz(a,h)anthracene	X	X	X
aramite	X			dibenzofuran	A	X	X
Aroclor 1016	X	X	X	dibenz(a,b)pyrene	X		
Aroclor 1221	X	X	X	dibenz(a,h)pyrene	X		
Aroclor 1232	X	X	X	dibenz(a,i)pyrene	X		
Aroclor 1242	X	X	X	1,2-dibromo-3-chloropropene	X		
Aroclor 1248	X	X	X	1,2-dibromomethane	X		
Aroclor 1254	X	X	X	dibromomethane	X		
Aroclor 1260	X	X	X	d-n-butyl phthalate	X		
benzene	X	X	X	m-dichlorobenzene	X	X	X
benzenethiol	X		X	o-dichlorobenzene	X	X	X
benzidine	X	(removed)	X	p-dichlorobenzene	X	X	X
benz(a)anthracene	X	X	X	1,3-dichlorobenzidine	X	X	X
benzo(b)fluoranthene	X	X	X	trans-1,4-dichloro-2-butene	X		
benzo(k)fluoranthene	X	X	X	dichlorodifluoromethane	X		
benzoic acid	A	X		1,1-dichloroethane	X		
benzo(ghi)perylene	X	X	X	1,2-dichloroethane	X	X	X
benzo(a)pyrene	X	X	X	1,1-dichloroethylene	X	X	X
p-benzoquinone	X			trans-1,2-dichloroethylene	X	X	X
benzyl alcohol	A	X		dichloromethane	X	X	X
alpha-BHC	X	X	X	2,4-dichlorophenol	X	X	X
beta-BHC	X	X	X	2,6-dichlorophenol	X		
delta-BHC	X	X	X	2,4-dichlorophenoxyacetic acid	X		
gamma-BHC	X	X	X	1,2-dichloropropene	X	X	X
bis(2-chloroethoxy)methane	X	X	X	cis-1,3-dichloropropene	X		
bis(2-chloroethyl)ether	X	X	X	trans-1,3-dichloropropene	X		
bis(2-chloroisopropyl)ether	X	X	X	dieldrin	X		
bis(2-ethylhexyl)phthalate	X	X	X	diethyl phthalate	X	X	X
bromodichloromethane	X	X	X	0,0-dimethyl-O-2-pyrazinyl phosphorothioate	X		
bromomethane	X	X	X	3,3-dimethoxybenzidine	X		
4-bromophenyl phenyl ether	X	X	X	p-dimethylaminobenzobenzene	X		
butyl benzyl phthalate	X	X	X	7,12-dimethylbenz(a)anthracene	X		
2-sec-butyl-4,6-dinitrophenol	X			1,3-dimethylbenzidine	X		
carbon disulfide	X	X		alpha, alpha-dimethyl-4-phenethylamine	X		
carbon tetrachloride	X	X	X	2,4-dimethylphenol	X	X	X
chlordane	X	X	X	dimethyl phthalate	X	X	X
p-chloroaniline	X	X		m-dinitrobenzene	X		
chlorobenzene	X	X	X	4,6-dinitro-o-cresol	X	X	X
chlorobenzilate	X			2,4-dinitrophenol	X	X	X
2-chloro-1,3-butadiene	X			2,4-dinitrotoluene	X	X	X
p-chloro-m-cresol	X		X	2,6-dinitrotoluene	X	X	X
chlorodibromomethane	X	X	X	d-n-octyl phthalate	X	X	X
chloroethane	X	X	X				
2-chloroethyl vinyl ether	X	X	X				

817
772-9740



VanTran ELECTRIC CORPORATION

7711 IMPERIAL DRIVE • P.O. BOX 20128 • WACO, TEXAS 76702-0128

April 16, 1986

Mr. Bill Munro
Chief, RCRA Enforcement Section, 5HE-12
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

RECEIVED

APR 21 1986

Dear Mr. Munro:

Below is the information you requested regarding our
interim status, and also enclosed are copies of our
closure plan we submitted to the IEPA and a manifested
PCB shipment Mr. Tom Hahn suggested we send you.

U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

1. VanTran Electric Corporation is (USEPA ID#0510350004)
located at 1505 VanTran Aveune, Vandalia, IL 62471.
At the above location we had a surface impoundment
used for the evaporation of paint residue.
2. This surface impoundment did not comply with all
applicable ground water monitoring and financial
responsibility requirements, nor was a Part B
application applied for.
3. On March 5, 1986, a closure plan for the surface
impoundment was submitted to:

Mr. Lawrence Eastep
Illinois Environmental Protecting Agency
Division of Land Pollution Control
Mail Code 24
2200 Churchill Rd.
Springfield, IL 62706

4. Paint and thinners were placed in this impoundment
on an average of 3-4 gallons per week. The unit
ceased receiving hazardous waste on June 3, 1985.

Correct ID #

ID 981 093 628

Mr. Bill Muno
April 16, 1986
Page 2

These answers should complete the four questions you requested. If not, please advise as soon as possible. I will help you anyway I can.

Very truly yours,

VANTRAN ELECTRIC CORPORATION

A handwritten signature in cursive script, appearing to read "Steve Parke", written in dark ink.

Steve Parke
Vice-President

SP/cjr

Encl.

CLOSURE PLAN

PAINT AND SOLVENT WASTE
SURFACE IMPOUNDMENT
VANTRAN ELECTRIC CORPORATION
VANDALIA, ILLINOIS

Prepared for:

VANTRAN ELECTRIC CORPORATION
7711 IMPERIAL DRIVE
WACO, TEXAS 76702

Prepared by:

BAKER ENGINEERING, INC.
ONE EAST WACKER DRIVE
CHICAGO, ILLINOIS 60601

February, 1986

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BACKGROUND AND HISTORY OF FACILITY

VanTran Electric Corporation owns and operates a manufacturing facility in Vandalia, Illinois on approximately three acres of land. Figure 1 provides a schematic plan view of the facility. The facility is located on U.S. Route 40 approximately one mile east of U.S. Route 51. The property is bounded on the east by an undefined street right-of-way; on the west by land occupied by a private facility; on the north by an Illinois Central Railroad right-of-way; and on the south by U.S. Route 40. VanTran has manufactured electrical transformers at the facility since 1962. Prior to mid 1976, VanTran manufactured and repaired PCB transformers at the Vandalia facility.

VanTran personnel report that prior to June, 1985, waste liquids and sludges and other spent solvents generated during painting operations conducted at the plant were placed in a small, unlined surface impoundment located on the plant site. The surface impoundment is approximately eight feet in diameter and three inches deep. According to VanTran personnel, the surface impoundment was the only on-site area intentionally used for placement of wastes.

The surface impoundment was in operation prior to promulgation of RCRA regulations. VanTran did not submit a Notification of Hazardous Waste Activity or a Part A RCRA permit application covering the surface impoundment, reportedly, because plant personnel were unaware of the regulatory requirements. On June 3, 1985, Illinois Environmental Protection Agency personnel obtained samples of soil and liquid at the

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surface of the impoundment for subsequent analysis. Results indicated the presence of PCB's, benzene, lead, methyl ethyl ketone, toluene and zylene. Table I provides a summary of analytical results obtained by IEPA. Consequently, on June 24, 1985, IEPA issued a notice of alleged violations of various provisions of title 35 of the Illinois Administrative Code and the Illinois Environmental Protection Act.

An exploratory soil sampling program was performed on October 17, 1985, at the direction of VanTran's legal counsel. The purpose was to determine the extent and magnitude of soil contamination in the impoundment. Samples of surface and subsurface soils were obtained from two borings located within the impoundment. The results, which are presented in a following section, indicate that soil within the impoundment contains concentrations of PCB's, benzene, lead, methyl ethyl ketone, toluene, and zylene. Cadmium and zinc were also detected. However, cadmium was detected only in the east boring at a depth of one foot to two feet.

In order to prevent potential environmental risks that may be posed by the impoundment, VanTran intends to close the surface impoundment as soon as possible. Closure will be performed by excavation, removal and off-site disposal of contaminated soils.

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TABLE I
VANTRAN ELECTRIC CORPORATION
VANDALIA, ILLINOIS
RESULTS OF LIQUID AND SOIL SAMPLING* IN SMALL
SURFACE IMPOUNDMENT
JUNE 3, 1985

(All analytical results expressed in parts per million)

<u>COMPOUND</u>	<u>LIQUID SAMPLES**</u>	<u>SOIL SAMPLES***</u>
PCBs		162
Benzene	6	-
Lead	55	25
Methyl Ethyl Ketone	21,000	4,000
Toluene	37,000	620
Xylene	25,000	35,000

*Samples obtained from surface of impoundment by IEPA personnel.

**Samples consisted of standing liquid on surface of impoundment.

***Samples consisted of a soil and liquid mixture on surface of impoundment.

February 25, 1986

-5- *Revised*

DESCRIPTION OF WASTE MATERIALS

Hazardous wastes that were placed in the surface impoundment were spent ignitable non-halogenated solvents (D001): xylene, toluene and methyl ethyl ketone. Small quantities of spent solvents are generated during painting, stripping and cleaning operations conducted as part of the transformer manufacturing operations at the plant.

Hazardous substances that were detected in the impoundment were PCB's, benzene, lead and cadmium. The specific sources of these contaminants in the impoundment are not known.

FACILITY WASTE INVENTORY AND CONTAMINATION ASSESSMENT

Estimates of the quantity of waste materials placed in the impoundment are not available because records were not kept during the period of operation. In June, 1985, VanTran personnel reportedly excavated the soil from the impoundment to an average depth of about one foot and placed all excavated soil in five 55-gallon steel drums. This was done in an effort to minimize any potential environmental risks associated with the impoundment. Reportedly the excavation was backfilled using clean fill material.

In October, 1985, an exploratory sampling and analysis program was conducted. The purpose was to estimate the extent and magnitude of soil contamination within the impoundment and to evaluate the feasibility of closure by removal of contaminated soils.

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Sampling locations were selected by dividing the circular surface area of the impoundment into two approximately equal semicircular areas and selecting boring locations near the approximate center of each area. Figure 2 shows the approximate locations of soil borings within the impoundment.

Soil borings were drilled to a depth of eight feet using a truck mounted drill rig. Drilling was performed using hollow stem augers. Soil samples were obtained by advancing a standard 1-3/8 inch inside diameter split spoon sampler through the auger stem. Borings involved continuous sampling of the soil at both locations. Each one-foot depth increment was retained for analysis as a discrete sample. Therefore, 16 discrete samples were obtained and analyzed (i.e. eight one-foot depth intervals in each of the two borings). Sampling equipment was cleaned and decontaminated between borings.

Based on the reported types and compositions of waste materials and the results of previous sampling and analyses performed by IEPA, soil samples were analyzed for the following parameters.

- PCBs

- Volatile Organics

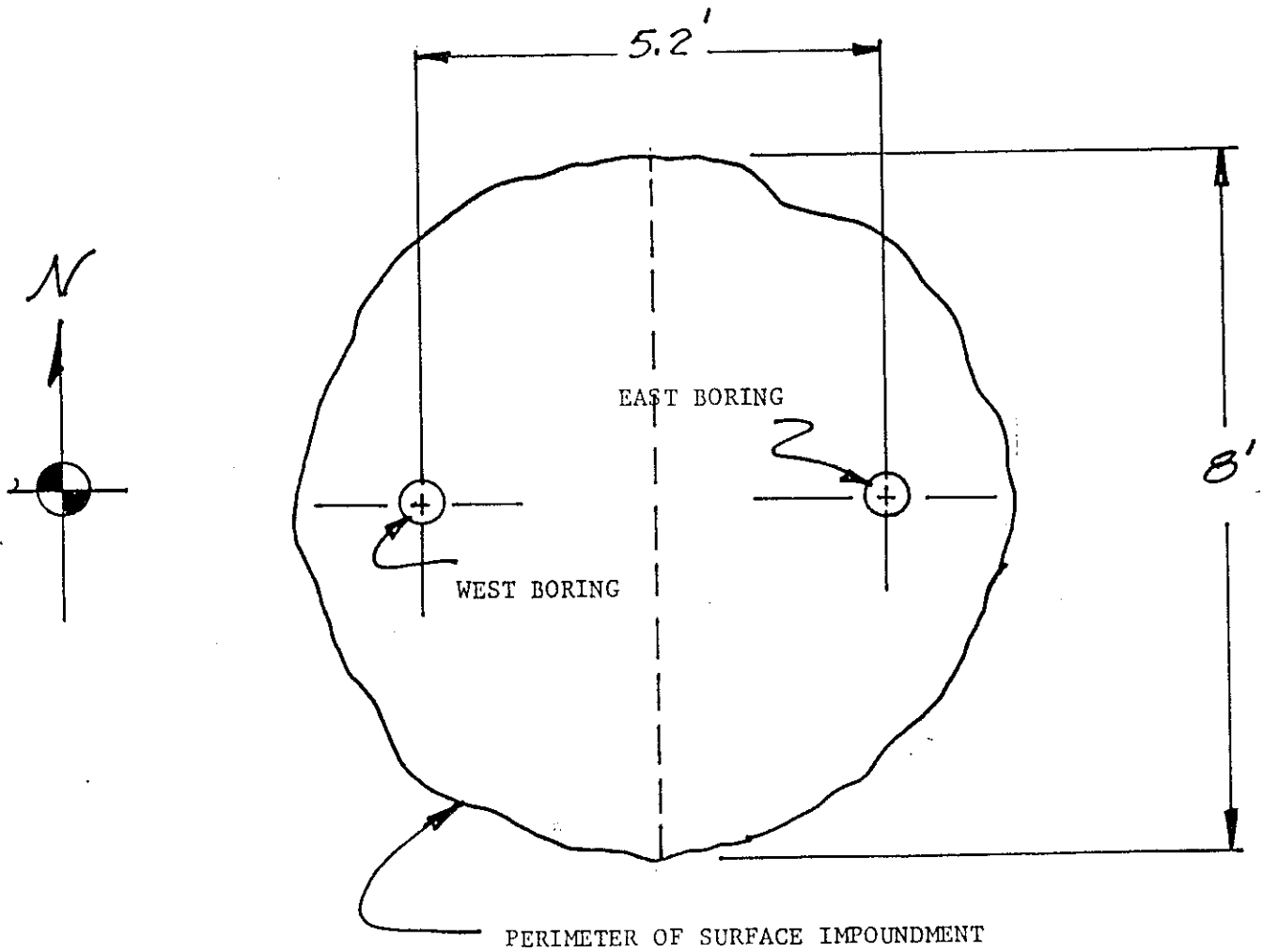
- o Benzene
- o Toluene
- o Xylene
- o Methyl Ethyl Ketone

- Metals

- o Lead
- o Cadmium
- o Zinc

FIGURE 2
VANTRAN ELECTRIC CORPORATION, VANDALIA, ILLINOIS
LOCATION OF SOIL BORINGS IN SURFACE IMPOUNDMENT

PLAN VIEW



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All analyses were performed in accordance with accepted laboratory practices utilizing EPA approved procedures and protocols. Analytical results, shown in Table II, are discussed below.

Significant PCB concentrations were detected in the upper two feet of soil in both borings. Significant concentrations of volatile organics were detected in the upper six feet of soil in the west boring only. Volatile organics concentrations in the east boring were below the detection limits in all eight one-foot depth intervals that were sampled. Lead concentrations were detected in both borings to a depth of eight feet. Cadmium was detected only in the 1 foot to 2 feet depth interval in the east boring.

FACILITY CLOSURE PLAN

The following closure plan addresses the excavation, removal and disposal of contaminated and potentially contaminated soils and subsoils contained within, and in the proximity of, the surface impoundment. The contaminated soil will be trucked to Chemical Waste Management Inc.'s secure landfill located in Emelle, Alabama.

Closure will be accomplished by excavation and removal of all contaminated soils and subsoils in the impoundment in accordance with requirements of 40 CFR 264.228(a)(1). A description of closure activities at the facility follows.

TABLE II
VANTRAN ELECTRIC CORPORATION, VANDALIA, ILLINOIS
RESULTS OF SOIL SAMPLING IN SMALL SURFACE IMPOUNDMENT - OCTOBER 15-17, 1985

(All analytical results expressed in parts per million ~ ppm)

DEPTH INTERVAL	BORING LOCATION A - EAST			BORING LOCATION B - WEST		
	PCBs*	VOLATILE ORGANICS**	METALS***	PCBs*	VOLATILE ORGANICS**	METALS***
0 to 1 foot	2300 (1254) 440 (1260)	BDL	170 (lead) 20 (zinc)	330 (1248)	BDL	190 (lead) 380 (zinc)
1 foot to 2 feet	1100 (1248)	BDL	110 (lead) 25 (zinc) 2.2 (cadmium)	72 (1242)	550 (xylene)	14 (lead) 150 (zinc)
2 feet to 3 feet	46 (1016)	BDL	14 (lead) 6 (zinc)	21 (1016)	30 (toluene) 190 (xylene) 1500 (MEK)	8.4 (lead) 25 (zinc)
3 feet to 4 feet	15 (1242)	BDL	13 (lead) 32 (zinc)	15 (1016)	180 (toluene) 1600 (xylene)	12 (lead) 19 (zinc)
4 feet to 5 feet	8.1 (1248) 4.0 (1254)	BDL	10 (lead) 21 (zinc)	10 (1016)	160 (toluene)	25 (lead) 15 (zinc)
5 feet to 6 feet	BDL	BDL	11 (lead) 23 (zinc)	16 (1232)	5 (benzene) 340 (toluene) 8800 (xylene)	7.6 (lead) 15 (zinc)
6 feet to 7 feet	3.4 (1260)	BDL	10 (lead) 21 (zinc)	BDL	BDL	11 (lead) 23 (zinc)
7 feet to 8 feet	BDL****	BDL	5.4 (lead) 23 (zinc)	3.8 (1242)	BDL	7.4 (lead) 20 (zinc)

*Samples were analyzed for PCBs utilizing gas chromatograph/electron capture techniques; limit of detection - 2 ppm.
Number in parentheses represents PCB formulation.

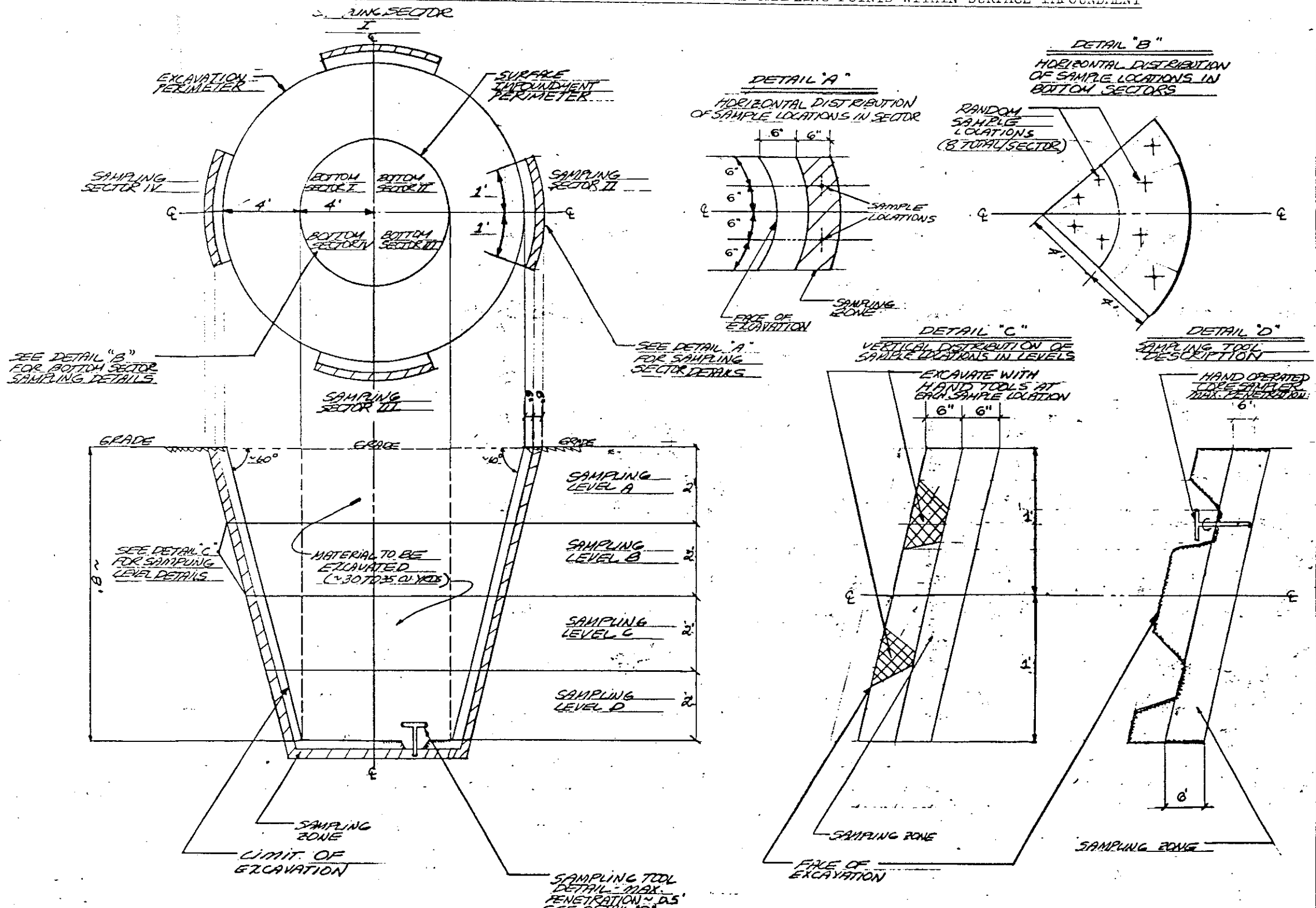
**Samples were analyzed for benzene, toluene, xylene and methyl ethyl ketones utilizing gas chromatograph/mass spectrometric techniques; limits of detection: benzene - 1 ppm; toluene - 10 ppm; xylene - 30 ppm and methyl ethyl ketone - 100 ppm.

***Samples were analyzed for lead, zinc and cadmium utilizing atomic absorption flame photometric techniques: limits of detection - 1 ppm.

****BDL - Below detection limits.

A. INITIAL EXCAVATION

1. The entire volume of soil in the impoundment will be excavated using a backhoe. This will be accomplished by excavating a roughly circular area at grade elevation approximately 16 feet in diameter and centered on the current surface impoundment as shown in Figure 3. Excavation will proceed to a depth of approximately eight feet maintaining a sideslope angle of about 60° from the horizontal. In this manner, all soil within the impoundment will be removed to a depth of about eight feet. Based on soil sampling and analyses performed to date, this would insure that contaminated soils within the impoundment will be removed. About 30 to 35 cubic yards of soil will be excavated.
2. The excavated soil will be loaded directly into a dump truck for shipment to the off-site commercial hazardous waste management facility for disposal. A work area adjacent to the impoundment will be roped off and warning signs bearing the legend "Danger - Unauthorized Personnel Keep Out" will be prominently displayed. The area to be secured is shown in Figure 1. Only personnel directly involved in clean up activities will be allowed to enter the perimeter of the work area. After completion of excavation and truck loading activities, the backhoe and dump truck will be visually inspected, and any soil accumulations will be manually removed. The residual soil will



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be placed into the dump truck for subsequent disposal at the landfill. The contaminated material will be managed as a hazardous waste utilizing appropriate State of Illinois, State of Alabama, U. S. EPA and DOT handling and shipping procedures including all appropriate manifests and shipping papers.

3. Prior to shipment, the work area will be visually inspected and any contaminated soil spilled during the loading process will be manually collected and placed into the dump truck for disposal. After the inspection is complete, the truck bed will be securely covered with a waterproof tarp and appropriate DOT/EPA warning labels and placards affixed to the truck.

B. SAMPLING AND ANALYSES PROGRAM

1. Following excavation and removal of contaminated soils, a sampling and analysis program will be implemented to demonstrate that decontamination of the impoundment has been achieved. The excavation area will be surveyed and staked to establish the sampling grid shown in Figure 3. The excavated area will be divided into four vertical sampling levels on the sideslopes of the excavation. The vertical levels are identified as A, B, C, and D in Figure 3. Each sampling zone will be centered along four equally spaced sectors on the circumference of the excavation. These sectors are identified as I, II, III and IV in Figure 3. For example, a sample identified as "I-B" will indicate that the sample was collected in Sector I, level B.

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2. A total of 16 discrete sampling zones will be established on the sideslopes of the excavation. The dimensions of each sampling zone are about 2 feet by 2 feet, as shown in Figure 3. Each sampling zone will be divided along the vertical axis into two equal area segments about 1 foot in length and about 2 feet wide. Two random sample locations will be selected within each segment, as shown in Figure 3, Details "A" and "C". A layer of soil, about six inches thick, will be removed from the sideslope of the excavation at the random sampling point using hand tools. The scraped soil will be allowed to fall into the bottom of the excavation, for subsequent collection and disposal with the other excavated material. Then, a horizontal core sample of about 6 inches deep will be obtained and placed in a clean stainless steel bucket. The core samples will be collected using a hand operated core sampler, as shown in Detail "D" in Figure 3. A total of four core samples from each sampling zone (two per segment) will be placed in the stainless steel bucket and returned to the sample workstation located in the Tank Shed Building. There the soil samples will be thoroughly mixed using a stainless steel spatula. Two new one quart glass bottles with teflon lids and seals will be filled with the soil samples for subsequent analyses. After samples have been collected, any soil remaining in the bucket will be placed into a 55 gallon drum for subsequent disposal with the excavated contaminated material. The two bottles will then

be labelled and the sample integrity and chain-of-custody seals applied. Then the chain-of-custody forms will be filled out by the sampler and the samples will be transferred to a locking refrigerator or ice chest for temporary storage and shipment to the analytical laboratory.

3. The sampling tools will be decontaminated between sampling zones using the following procedure. All decontamination activities will be executed at the workstation. Initially, all sampling tools will be scrubbed with a laboratory type brush and mild abrasive cleaner to remove soil accumulations. This washing procedure will be followed by a tap water rinse and a second wash/rinse cycle. Then, the sampling tools will be rinsed with distilled water followed by a hexane rinse. All liquid waste products generated during this procedure will be accumulated in appropriately labelled and identified 55-gallon drums. At the end of the sampling program, the accumulated rinsewaters will be analyzed for the constituents of concern and appropriate off-site treatment/disposal/recycling method selected.
4. After the sixteen sideslope samples have been collected using the above procedures, samples from the bottom of the impoundment will be obtained as follows. Initially, the soil residue at the bottom of the impoundment will be manually removed using hand tools and deposited in the dump truck with the other excavated contaminated material. Then, the plastic soil liner previously

-15-

placed at the bottom of the excavation will be removed and disposed in the dump truck. The bottom of excavation will then be divided into four approximately equal area sectors as shown in Figure 3. A minimum of eight vertical core samples, to a depth of about 6 inches, will be obtained in each sector, as shown in Detail "B" in Figure 3. The core samples will be obtained using a hand operated core sampler. The soil samples from each sector will be placed in a clean stainless steel bucket and returned to the workstation. There, the core samples will be thoroughly mixed in the stainless steel bucket using a stainless steel spatula. After compositing, two new one quart glass bottles with teflon seals will be filled with the soil sample. Any remaining soil in the stainless steel bucket will be collected in a 55 gallon drum for subsequent disposal with the excavated contaminated soil.

5. The sample bottles will be immediately labelled, integrity seals applied and the chain-of-custody forms filled by the sampler. Then, the samples will be transferred to a locking refrigerator or ice chest for temporary storage. All sampling tools will be decontaminated between each sampling sector, using the procedures specified in step B-3, above. The above sampling method will be repeated until the four bottom sector samples are collected.

CLOSURE CRITERIA

In the absence of specific criteria for clean closure of hazardous waste sites, VanTran proposes to use the local background levels for contaminants of concern as criteria for determining site contamination/decontamination. Background levels will be determined by sampling surface and subsurface soils on properties adjacent to the VanTran site as well as by review of available information concerning chemical analyses of soils in the Vandalia, Illinois area. The objective of decontamination activities is to remove materials with concentrations of contaminants in excess of the closure criteria. If post-excavation sampling and analyses indicate that concentrations in exposed soil are below the criteria, the impoundment will be considered to be decontaminated. However, if contaminant concentrations exceed the criteria, additional soil will be excavated in areas with high concentrations and disposed of as described above. Excavation and resampling/analysis will be continued until analytical results indicate that the contaminant concentrations are below the closure criteria.

Upon successful demonstration of decontamination, the excavated area will be backfilled to current grade elevation using clean fill material. Finally, the area will be revegetated by application of a grass sod cover.

SCHEDULE OF CLOSURE ACTIVITIES

It is estimated that closure of the facility, in accordance with the above plan, can be accomplished with 60 days of approval to proceed.

February 25, 1986

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CLOSURE COST ESTIMATE

A general outline of activities necessary to close the impoundment in accordance with the plan described above and estimated costs are shown in Table III. Total cost of closure is estimated to be approximately \$23,000.

POST CLOSURE PLAN

Because wastes and contaminated subsoils will be removed, no post closure activities will be necessary.

TABLE III
ESTIMATE OF COSTS FOR CLOSURE

<u>ACTIVITY</u>	<u>COST</u>
Excavation	\$ 600
Transportation	2,100
Landfill Disposal	5,600
Resampling and Analyses	10,000
Backfilling/Revegetate	500
Contingencies	<u>4,200</u>
TOTAL	\$23,000



Nuclear Engineering Company, Inc.

P.O. Box 7246
Louisville, Kentucky
40207

- ☐ San Ramon, California
- ☐ Beatty, Nevada
- ☐ Richland, Washington
- ☒ Sheffield, Illinois
- ☐ Morehead, Kentucky

INVOICE

To insure proper credit of your account
please return pink Remittance Advice.

VAN-TRAN ELECTRIC COMPANY

P. O. BOX 335

VANDALIA, IL. 62471

Remittance Advice Must Accompany Payment

Please Remit To:
P.O. Box 7246
Louisville, Kentucky 40207

DATE: 6/28/76	INVOICE NUMBER: -2013055	CUSTOMER'S PURCHASE ORDER:	TERMS: Net 30 days
---------------	--------------------------	----------------------------	--------------------

☒ Received/ ☐ Removed from your facility 6/28/76

FOR COMPLETE DISPOSAL OF HAZARDOUS CHEMICAL WASTES:

15.00 cu., ft. total

MINIMUM CHARGE \$ 40.00

"A service charge of 1½% per month (but not to exceed the lawful applicable rate) will be added to all accounts not paid within the specified terms. Collection costs, including attorneys' fees, will be added to past due accounts placed for collection."

TOTAL AMOUNT DUE \$ 40.00

*Paid by cash
40.00
6-28-76
m.H*

531

HAZARDOUS WASTE SHIPMENT RECORD FORM

er Van-Pham & Lecter Nguyen Date 6-28 19 76
Address P.O. Box 335 Nandalan, Ill Page 1 of 1 pages

3. **DISCLAIMER:** Title to all materials which were previously owned by the customer or supplier contained in waste furnished for burial as listed on this form or under this contract shall be deemed to be vested in Nuclear Engineering Company, Inc. upon delivery to our facilities or placed aboard our vehicle. The customer or supplier shall have no right to the recovery of any material contained in such waste nor any credit for their potential value.

[illegible]

Box, Glass, Wood, etc.
Sludge, Liquid, or Gas

SHIPPER

RECEIVED BY

DISTRIBUTION: White-NECO; Yellow-Transportation; Pink-Customer



Nuclear Engineering Company, Inc.

P. O. BOX 158, SHEFFIELD, ILLINOIS 61361 ■ PHONE: (815) 454-2624

NECO USE ONLY
REQUEST # _____

I. GENERAL INFORMATION

- A. NAME OF SPECIAL WASTE GENERATOR * Vantray Elex Corp
ADDRESS 1505 Vantray Ave
TELEPHONE 618-263-3220 Vandalia, Ill
- B. NAME OF SPECIAL WASTE HAULER * Vantray Elex Corp
ADDRESS 1505 Vantray Ave
TELEPHONE 618-263-3220
- * A RECORD OF THE WASTE GENERATORS SHALL BE MAINTAINED BY THE HAULERS AND MADE AVAILABLE TO THE ILLINOIS STATE EPA UPON REQUEST.

II. CHARACTERISTICS OF WASTE:

- A. QUANTITY 15 cubic feet PER year
(CUBIC FEET OR GALLONS) (DAY, MONTH, YEAR)
- FOR one time
(ONE TIME, WEEK, MONTH, YEAR)
- B. QUALITY: Physical State: SOLID solid saturated with liquid LIQUID (AMT) GAS (AMT) SLUDGE (AMT)
- GENERAL CATEGORY:

POISON _____ CORROSIVE _____ FLAMMABLE SOLID _____ TOXIC ☒

FLAMMABLE LIQUID _____ OXIDIZING _____ OTHERS _____

1. NAME OF WASTE Oil barrel
2. NAME THE PROCESS AND/OR THE TYPE OF INDUSTRY PRODUCING THE WASTE Electrical transformer manufacturing S I C CLASSIFICATION 3612
3. AN ANALYSIS OF THE CHEMICAL AND PHYSICAL CHARACTERISTICS OF THE WASTE MUST BE DETERMINED BY A QUALIFIED LAB AND ATTACHED TO THIS APPLICATION.
DOES THE SPECIAL WASTE CONTAIN ANY HAZARDOUS CHEMICALS? PCB arochlor 1242

SEE THE REVERSE SIDE FOR INSTRUCTIONS

4. ALL HAZARDS (HEALTH, SAFETY, AND/OR FIRE) AND/OR NUISANCE PROBLEMS ASSOCIATED WITH THE WASTE MUST BE DESIGNATED, AND NECESSARY SAFETY AND HANDLING PRECAUTIONS DELINEATED. SPECIFY COMMUNICATIONS AND ASSISTANCE IN CASE OF EMERGENCY OR FIRE, AND ATTACH TO THIS APPLICATION.

NECO USE ONLY

AMOUNT RECEIVED _____ FOR MONTH 19 _____